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November 14, 2005

Charles M. Auer
Director, Office of Pollution Prevention and Toxics
United States Environmental Protection Agency
Ariel Rios Building (7401M)
1200 Constitution Avenue, N.W.
Washington, D.C. 20460

Dear Auer:

I write on behalf of Albaugh, Inc. ("Albaugh") to acknowledge receipt of EPA's letter dated August 15, 2005, regarding the analysis of 2,5-dichlorophenol (CAS No. 583-78-8) under EPA's TSCA section 4 "Dioxin/Furan" (D/F) Test Rule (40 C.F.R. Part 766). EPA's letter accepts the proposed amendments to Albaugh's previously submitted "Analytical Protocol, Sampling Protocol and Quality Assurance Project Plan for the Determination of Polychlorinated Dioxins and Furans in Collected Samples. . ." (Battelle Study No.: AG030002; DCN: 40040000007). Because the protocol is now complete, EPA states that it is the Agency's position that Albaugh must analyze the retained samples of 2,5-dichlorophenol in accordance with the test rule.

Albaugh continues to believe that it is unnecessary and of little value for it to conduct an analysis of the above samples since the Company is no longer manufacturing (including importing), processing, using, or distributing the test chemical in commerce in the United States, nor does it have any intention of doing so in the future. Nonetheless, as it has done throughout this process, Albaugh will continue to cooperate in good faith with EPA and will conduct an analysis of the seven (7) samples in its possession in accordance with the approved protocol. In doing so, however, Albaugh is not waiving its position that such testing is not required under TSCA because Albaugh is not engaged in any activity regulated under the test rule.

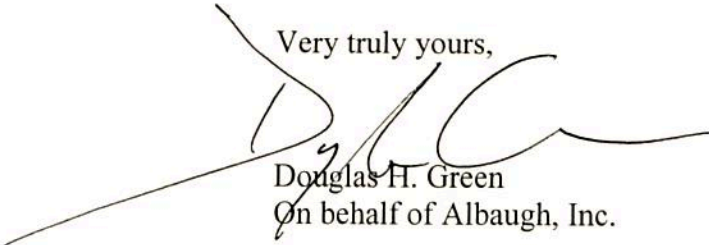


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If you have any questions regarding the issues raised above, please contact the undersigned at (202) 861-3847.

Very truly yours,



Douglas H. Green
On behalf of Albaugh, Inc.

cc: David Williams/OPPT/OPPTS (7405M)
Mark Garvey/ORE/OECA (2245A)
Oksana Pozda/OPPT/OPPTS (4704T)
Stuart Feldstein/Albaugh